

ATTACHMENT 1

COMPLAINT FORM

(for non-prisoner filers without lawyers)

IN THE UNITED STATES DISTRICT COURT
FOR THE Western DISTRICT OF Wisconsin

(Full name of plaintiff(s))

Maryann [Shaw] Nawrocki

vs

(Full name of defendant(s))

Target Corporation-Stores

Case Number:

23 CV 180 JDP

(to be supplied by clerk of court)

A. PARTIES

1. Plaintiff is a citizen of Florida and resides at
(State)

600 North Washington St. Apt 122, Jacksonville
(Address)

(If more than one plaintiff is filing, use another piece of paper).

2. Defendant Target Corporation-Stores

(Name)

is (if a person or private corporation) a citizen of Minnesota

(State, if known)

and (if a person) resides at 1000 Nicolette Mall Minneapolis MN

(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Target Corp. Stores 1000 Nicollette Mall Minneapolis, MN.

(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

[1] The Target Corporation -Stores violated my Constitutional Right[S] to fair and equal

treatment. A vilocation of the 14 Amendment. My rights were violated when the

Target Corpporation-Stores, called my Primary Care Physical and requested a re-

turn to work "without any restrictions," when Target and my primary physician knew I

was permanently damaged. Target Corporation-Stores did NOT follow PROPER

PROTOCOL, Target has FORFEITED the right to deny me the compensation I have

requested, because Target didn't follow their own proper protocol. Target didn't

mandate an IME or any MRI'S, after I reported my injuries to Target. My lawsuit

must be settled, I need the compensation I have requested to make me WHOLE!

[2] Target Corporation -Stores, violated my Constitutional rights.

Target Corporation-Stores, violated the 14 Amendment. Target denied me

medical care, and left me to live my life with UNTREATED TRAUMA to this

present time. Taget Corporation-Stores defamed my character and falliciously

accussed me of being a drug addict and/ or alcoholic and this is the reason why I

was injured. I was injured at Target performing a job I asked NOT to perform. I was

injured at Taget because Target was negligent, and forced me, because I am African

American, I was FORCED to work at the most dangerous part of the line. Target was

also negligent because Target's executive lead knew I respectfully and repeatedly asked

not to work the truck. I was told a lie to coerce me to work the truck. Target was

negligent because Target did not provide me with a BACK BRACE to support my

back while unloading the truck. I was NEVER TRAINED to unload the truck.

[3] I WAS INJURED ON MAY 15, 2009. THIS IS WHEN IT WAS DONE TO MY

BODY.

[4] I WAS INJURED AT THE TARGET STORE LOCATED AT 4301 LIEN ROAD IN

MADISON, WISCONSIN

[5] I was injured because of HATE and DISCRIMINATION, I was sometimes the ONLY

African American on duty at the Target Store. I was micromanaged and quietly

harassed inside the Lien Road Target Store. I've been falsely accused of having

poor conduct and poor work performance, this has not been proven because it's not

ever going to be proven, because I was an excellent team member during my employment with the Target Corporation-Stores. There wasn't poor conduct or poor work performance from me, while I was employed with the Target Corporation-Stores. I have NEVER BEEN A DRUG ADDICT NOR HAVE I EVER BEEN AN ALCOHOLIC... It did not matter how: Kind. Caring. Patient. Accomadating, or how hard I worked for Target Corporation-Stores. I was of African descent, African American. I was not wanted inside the Target Store. There wasn't any reason to put a 40 something woman on the line to work the truck, when there were MANY male employees waiting to display their prowess, their virility to unload Target's big semi-trailer truck. This was harassment, Target wanted me to be injured, or Target wanted me to "walk away from my employment with the Corporation."

I worked at the worse end of the line until the big truck was completed. I had to work in a small space, at a fast pace at the worse part of the line, I was stationed at the worse part of the line because I am African American. Thought of as a SLAVE. I had to bend, stoop, twist, reach, kneel, squat, lean over, and LIFT, sometimes OVER my head, to put on pallets TALLER than I was, big heavy boxes. And on May 15, 2009, some of the boxes were WET! Because the boxes were wet, I had to use the RIGHT SIDE of my body to SUPPORT the WET boxes! If I had not, the products inside the boxes would have fallen out of the boxes onto Target's floor, slowing down, or stopping the unloading of Target's semi-truck.

I sustained permanent damages unloading Target's truck. I have CERVICAL SPINE damages. I have Lumbar Spine damages. I have a full tear Rotator cup tear. I have had to live with these severe permanent damages for nearly 15 LONG PAINFUL YEARS! Target should have mandated an IME and MRI'S. Target did absolutely NOTHING for me, AFTER I SUSTAINED the injuries to my body.

Because Target abandoned me, and did not offer me medical CARE, the injuries I sustained have progressed to worse. I hadn't filed any lawsuits, I expected medical CARE after I was injured. Instead of Care, my injuries were covered up! I was left with untreated trauma.

If not for the Great State of Florida, there wouldn't be any medical evidences of the injuries I sustained at the Madison, Wisconsin East Side Target Store. I will submit to the court, MEDICAL RELEASE FORMS.

I have included my medical professionals name and phone numbers.

I need to be made WHOLE! I need a acceptable agreement or settlement for the permanent damages I sustained to my body. Not the 900.00 farce of an agreement Target has offered me, this agreement will never suffice.

I WAS INJURED BY NO FAULT OF MY OWN. I had to LIVE WITH SEVERE PAIN FOR NEARLY 15 LONG YEARS!! WHEB THE TARGET CORPORATION-STORES HAD MORE THAN THE MEANS TO CARE FOR THEIR INJURD TEAM MEMBER, but did not, only because I am African American, because I remain injured. 03/01/23

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☒ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$90,000,000.

D. RELIEF WANTED

Describe what you want the court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or stop doing something.

I want the COURT to order the Target Corporation-Stores..... to revise my

Full and Final Compromise Agreement, to include compensation for the permanent

damages I sustained to my body.... unloading Target's big Semi-truck. I need a formal

apology. I need my injuries reported to OSHA, by Target Corporation -Stores. I need

punative damages. I need compensation for the time that has passed I have had to

live with UNTREATED TRAUMA, because Target knew I was permanently injured

but denied me care. I want my worker's compensation started. I need to move out the

shelter. I've requested a lump sum from the WDW worker's compensation Division, that

will help me to relocate from the shelter. A place I should not have to live in because

Target has more than the means to make me WHOLE! I was injured by no fault of

my own. I need Target Corporation -Stores to settled my lawsuit. But for now, I need

the DWD Worker's compensatio Division to Tranfer to my bank account the

FINANCE I have requestd to relocate to a place of my own. Because of the injuries I

sustained at Target, I cannot MAINTAIN "PREINJURY" GAINFUL EMPLOYMENT!

Therefore I have had to live in homeless shelter just to survive. I need a place of my

own! Because Target is "responsible" and "culpable" for the damages , permanent

damages, I sustained to my body, Target is NOW responsible for my livelihood!!!!

also, ther are treatments I need to feel better, that "Medicaid' refuses to pay for... I

need Target to pay for the treatments, or advise Sedgwick Insurance company to

pay for the treatments and the products I need to walk better & to ease my pain.

Because of the injuries i sustained at Target, I have live me life with untreated

trauma to this present time. I need to be made WHOLE! The first step to making me

whole is providing me the health care I needed AFTER I was first injured in 2009.

Because I was left untreated, by Target and the State of Wisconsin my injuries have

progressed to worse! I need better insurance than Medicaid. NOW that there are

MRI'S of the damages I sustained to my body, I NEED TARGET TO ACT

"ACCORDINGLY," AND PROVIDE FOR ME THE "COMPENSATION" AND THE

MEDICAL CARE I SHOULD HAVE RECEIVED IN MAY OF 2009!!!

I will sign medical release forms for the COURT to receive the medical evidence of

the damages I sustained to my body unloading Target's truck. A job I asked not to do.

E. JURY DEMAND

☐ Jury Demand - I want a jury to hear my case
OR

☒ Court Trial - I want a judge to hear my case

Dated this 14 day of March, 2023.

Respectfully Submitted,

Maryann Kauracki
Signature of Plaintiff

904-704-8835

Plaintiff's Telephone Number

verbalart62@yahoo.com

Plaintiff's Email Address

600 N. Washington St. Apt 122

Jacksonville, Florida, 32202

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper).

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE

☒ I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a request to proceed in the district court without prepaying the fee and attached it to the complaint.

☐ I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.